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The Voice of Rural Telecommunications

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FEDERAL COMMUNICATIONS COMMISSION  
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92-237

July 29, 1997

FED

COMMUNICATIONS COMMISSION  
SECRETARY

CICS

ex parte

Ms. Elizabeth Nightingale  
Federal Communications Commission  
Common Carrier Bureau  
Network Services Division  
2000 M Street, N.W.  
Washington, D.C. 20554

Re: Updated Reply to Request for information in Docket 92-237

Dear Ms. Nightingale:

In response to your request we conducted an abbreviated survey of our members to gain as much insight as we could given the very short time requirements.

We received responses from 304 companies to a broadcast fax to all 496 member companies. As of July 1, 1997, 346 of 496 of our member companies were offering equal access. It appears that about 100 of our member companies (+ or - 25) will not be providing equal access by the end of 1997. These companies are not required to provide equal access and have based switch replacement and software upgrade plans on overall requirements including the proposed six year CIC transition period and had not planned to make these expenditures in 1997. By and large, companies in the most rural and isolated areas have never received bona fide requests to provide equal access and have no current plans for equal access.

Survey results are summarized below. Responses are not a scientifically valid random sample and caution should be used when interpreting this data since almost 200 companies did not respond and those responding may not be representative of those who did not respond.

1. Many respondents which do not offer equal access have the capability to provide equal access using 4-digit CIC and 7-digit CAC now or will have the capability by the end of 1997.
2. Of those responding, six LECs with exchanges required to offer equal access will not be able to support 4-digit CIC and its associated 7-digit CAC by the end of 1997. Five of these six companies, require switch replacements and one is waiting for a software upgrade which the vendor cannot complete until Feb 1998. Three of the switch replacements are schedule to complete during the first half of 1998. The other two of the switch replacements must go through the RUS funding approval process and will not complete until sometime in 1999.

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3. Of the 304 companies responding, 18 (6%) which are providing 3-digit equal access indicated they had software upgrades to perform before they could support 4-digit CIC and 7-digit CAC. Some of these may carryover into the first part of 1998.
4. 37 companies indicated that software upgrades are required for 175 switches. The average software upgrade cost is \$75,000 each, these upgrades typically include other features beside support for 4-digit CIC and 7-digit CAC.
5. 19 companies indicate that 71 switch replacements are required. Of the 15 companies providing cost estimates, the average switch replacement cost is approximately \$500,000 each.
6. We have no information regarding recognition of interchangeable area codes or the toll free 888 numbers. Also we have no information on the percentage of carriers which will be required to provide equal access as of December 31, 1997.

Please call me (202-298-2333), if you have questions on this information.

Sincerely,



Scott Reiter  
Senior Industry Specialist

**FEDERAL COMMUNICATIONS COMMISSION**

**CC Docket No. 92-237  
Administration of the North American Numbering Plan  
Carrier Identification Codes (CICs)**

**July 24, 1997**

**REQUEST FOR INFORMATION FROM NTCA**

Please note that the information we seek is intended to be relied upon for inclusion in the public record in CC Docket No. 92-237. This request will also be included in the docket. You may fax your response to Elizabeth Nightingale at (202) 418-2345 or e-mail it to her at "enightin@fcc.gov". **Please respond by Tuesday, July 29, 1997.** We will be responsible for assuring that your response is included in CC Docket No. 92-237. Thank you for your cooperation. If you have any questions, you may call Elizabeth Nightingale at (202) 418-2352.

Please answer the following questions:

- 1) As of July 1, 1997, what percentage of your local exchange carrier (LEC) members were required to provide equal access?
- 2) Of those LEC members that, as of July 1, 1997, were required to provide equal access, what percentage, as of that date, had end office switches capable of recognizing four-digit carrier identification codes (CICs) and the corresponding seven-digit carrier access codes (CACs)?
- 3) Of those LEC members that, as of July 1, 1997, were required to provide equal access and did not have switches capable of recognizing four-digit CICs and seven-digit CACs, what percentage will be able to convert their switches with a software upgrade and what percent will have to replace their switches, in order to recognize four-digit CICs and seven-digit CACs?
- 4) Please estimate the cost for software upgrades and for switch replacement.

software upgrades

an estimate of \$ \_\_\_\_\_ per system.

an estimate of time per system \_\_\_\_\_.

switch replacement

an estimate of \$ \_\_\_\_\_ per system.

an estimate of time per system (installation) \_\_\_\_\_.

- 5) When did your LEC members that are required to provide equal access upgrade their end office switches to recognize interchangeable area codes (INPAs)? Did the upgrade include the four digit CIC capability?
- 6) When did your LEC members that are required to provide equal access upgrade their end office switches to recognize the toll free 888 numbers? Was it the same upgrade as that for INPAs? Did the upgrade include the four digit CIC capability?
- 7) Of those LEC members that, as of July 1, 1997, were not required to provide equal access, what percentage do you anticipate will be required to do so as of December 31, 1997?